

F. #2019R00001

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

– against –

Criminal Docket No. 21-425 (KAM)

BRENT KAUFMAN,

Defendant.

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The United States of America, by and through JACQUELYN KASULIS  
Acting United States Attorney for the Eastern District of New York, and Jonathan Siegel,  
Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture  
of Property.

The above-captioned Information seeks forfeiture of property pursuant to Title  
18, United States Code, Sections 982(a)(2) and 982(b)(1). The United States hereby gives  
notice that it seeks forfeiture of the following property seized on or about September 17,  
2019 from the defendant's residence in or near Melville, New York, pursuant 982(a)(2) and  
982(b)(1), as to the Sole Count of the Information:

- (1) Ladies Breitling Stainless Steel with pink Mother of Pearl diamond dial;  
Model A71340, SN 941755, Watch Box included;
- (2) Ladies 14K white gold 3 tier diamond pendant containing "Yellow" oval  
(4.11mm x 5.69mm) ~1/2ct, "pink" heart shape (4.2mm x 4.5mm) ~.25pt,  
"blue" pear shape (6.9mm x 5mm) ~.70pts. These diamonds are surrounded by  
78 round full cut diamonds ~.80 and 2 bezel set diamonds ~.09pt, ~1ct TDW  
rounds, ~1.45 TDW fancy, 5 DWT;

- (3) Ladies 14K White Gold Diamond Circle Pendant with (16) 4mm diamonds ~ 4 CTS Total Weight, 6.2 DWT;
- (4) Ladies 14K white gold diamond flower pendant containing 6 pear shape “colored” diamonds, (7mm x 5mm) Pink, Yellow, Green, Orange, Light Yellow, Dark Yellow. ROUND FULL CUTDS: 591.7mm ~1.20ct, 6-2mm ~.25pt and 1-2.7mm ~.08 around and in the middle of the flower, Chain contains 8-3mm round brilliant cut ~.80pt, bezel set, 4.5ct “fancy” TDW, 2.35CT RFC 7ct TDW, 8.1 DWT;
- (5) Ladies 18K white gold “white” diamond choker necklace containing 8 pear shape ~.65pt, 11 marquise shape .90pt, 83round full cut ~5ct. 3 Pear shape “Yellow” diamonds, ~.80pts are set in yellow gold dangling from the center, ~ 63/4 ct TDW, 13.3 DWT;
- (6) Gents “Rolex” Two Tone Yacht Master, Mother of Pearl Factory Dial and Ruby Markers, Model #16623, SN D994257;
- (7) Ladies 3 Row 5.75mm x 6mm Pearl Bracelet with 14K White Gold Clasp diamond clasp, Burgundy Bracelet Jewelry Box;
- (8) Gents Movado Bold Blue Dial Grey Titanium Case, bezel & bracelet; SN #12258850;
- (9) 1 pair 14K Rose gold & White gold Diamond Earrings in Brown Leatherette jewelry box; each earring contains 7 rd dia - .10pts ~.70ct, 1-.15pt, 16 round “pink” diamonds ~.48pts and center marquise ~1.25ct (10.5x5.5mm) H-I VS1 clarity (subject to GIA certification), 2.65ct TW round diamonds and ~2.5ct TW in Marquise, ~ 5.15 TDW, 6.7 DWT;
- (10) 14kt Yellow Gold Opal Ring, 4.6 DWT;
- (11) Ladies 18K rose gold 18mm diamond band with (6) rose cut round diamonds 3.3mm ~1 ct TW, 106 (1.6mm) round full cut diamonds ~1.60cts total weight, 8.8 DWT;
- (12) Ladies 18K white gold diamond 11mm band with (30”) multi colored” diamonds, (6) marquis, (4) rounds, (7) cushion, (1) heart, (4) oval, (9) pear shape, (1) triangle ~4.5 total carat weight 5.8 DWT;
- (13) Ladies 18K white and rose gold ring oval shaped setting with crisscross diamond shank. Ring contains (10) “multi colored” and multi shaped diamonds ~1.5cts total weight, 228 (1.5mm) round full cut diamonds ~3 3/4ct total weight, 8.2 DWT;

(14) Ladies 18K and platinum diamond emerald diamond ring containing 5 straight baguette cut Light Green Emeralds, 2- 7.6mm x 3.2mm =1.10ct, 2-3.7mm x 6mm~1.ct and 1-10 x 4mm ~1ct, ~3.20ct TW, 2 bullet shaped diamonds ~.40pts ROUND FULL CUTS: 12 ~.40pts diamonds on shank graduating in size and 42 1.4mm ~.50pts 1.30 TDW, 7. 7 DWT;

(15) Ladies 18K white gold diamond flower petal ring, containing 26 round brilliant cut diamonds~ 3ct, 33.02 ~.65ct 3.65TDW, 4.8 DWT;

(16) Ladies 18K white gold oval convex diamond ring with 23 “multi colored” diamonds: 3 round, 6 pear, 5, cushion, 1 tapered baguette, 5 ovals, 1 triangle, 1 heart, 1 emerald cut, ~2.10ct total weight, 52 round full cut diamonds ~ .40ct 2.50ct TDW, 3.6 DWT;

(17) Ladies 18K white gold diamond ring containing center “pink” marquise diamonds ~.30pts, ROUND FULL CUTS: 16-3.2mm”2ct, 16-2.1mm ~.56pts, 16-1.3mm ~.16pts 16-.09mm ~.08pts “Pink” and 2 tapered baguettes ~.40pts, 3.20ct TDW, 8.4 DWT;

(18) Ladies 18K rose gold heart shaped diamond (7.85mm x9.08mm x 4.27mm) ~ 2ct, H-I color SI2 clarity (subject to GIA grading) ROUND FULL CUTS: 12 graduating each side on the shank 24~.25pts, and 26 -1.35mm~.30pts, Bead set into frame around center, 2.60ct TDW, 3.5 DWT;

(19) Ladies 18K white gold ring containing center “pink” pear shape (6mm x 4mm) ~.60pt diamond, “pink” and white diamonds on top and shank of ring. ROUND FULL CUTS: Shank- 28-1.4mm ~.40pts, 12-3mm~.1.20cts, 2 rows “pink” 35-1.3mm ~.35pts, 16-1.1mm~.15pts, 2.70ct TDW, 4.5 DWT;

(20) Ladies 18K white gold diamond and black triplet Opal (10mm x 6.5mm) ring containing 38-1.2mm and 4-2.4mm diamonds~.60pts, 4.1 DWT;

(21) Ladies 18K white gold diamond ring containing center Emerald Cut “Columbian” green emerald (7.7mm x 5.8mm) ~1.75ct, 2 (3mm x 5mm) Emerald Cut Diamonds~ 1.20ct TW, ROUND FULL CUTS: 40-1.3mm ~.40pts, 18-1.4mm ~.25pts, 8-1.35mm ~.10pts, 8-1.0mm~.05pts, 8-1.1mm ~.07pts, TDW, 4.4 DWT;

(22) Ladies 18K white gold diamond ring containing center Oval 9mm x 7mm ~ 2ct Pink Sapphire, ROUND FULL CUTS: 34-1.6mm ~.55, 48- 2.0mm ~1.50cts, 16- 2.4mm ~1ct, TW ~3ct and 16-1.2mm x 3mm tapered baguettes ~1ct, 3ct TDW4.6 DWT;

(23) Ladies 18K tricolor gold band containing 3 cushion shape “yellow” and 2 round “yellow” diamonds~ .50pts, 73-.09mm “pink” diamonds and 60-.09mm

RFC, ~1.30 TDW, 5.5 DWT;

(24) Ladies 18K white gold diamond ring containing center Oval 7.8mm x 9.8mm Blue Sapphire, ~3ct. Round Full Cut diamond: 76-1.6mm~1.20ct, 6-1.5mm~.09pts, 6-1.6mm~10pts, 6-1.7mm ~ 12pts, 10-1.8mm~ .25pts, 4-1.9mm ~.12pts, 8-2.5mm~.56pts, 8-3mm ~ .80pts, 3.25ct TDW, 6.8 DWT;

(25) Ladies 18K white gold diamond ring containing center “Pink” radiant ~.40pts, ROUND FULL CUTS: 4- 2.1mm ~.14pts, 34-1.2-1.5mm~.40pts, 66-.08-1.1mm~.52pts, “Pink” 16-1.2mm~.1spts, 60-.08mm~ .30pts, 1.50ct TW and 8-2.75mm x 1.30mm tapered baguettes ~ .50pts, 5.3 DWT;

(26) Ladies 14K white gold diamond ring containing center “pink” 4mm ~.25pt diamond, Round Full Cuts: 10-2mm~.33pts, 10-1.6mm~.16pts, 10-1.9mm~.30pts,, 12-1.7mm ~ .24pts, 1.03ct TW, 1.28ct TDW, 3.5 DWT;

(27) Ladies 18K white gold diamond ring containing 130 1.3mm rfc ~1.30cts, and 7 “Multi colored” Oval diamonds ranging in size from 2.7mm x 3.1mm to 3mm x 4.5mm, ~1.25ct TW, 2-Yellow, 1 ea: Purple Pink, Blue, Orange, Cognac. 2.55ct TDW, 4.3 DWT;

(28) Ladies 18K white gold diamond ring containing center 7.7mm Round “Columbian” (deep Green) Emerald~ 1.75ct, 82-1.5mm RFC ~2ct and 22-1.3mm x 1.5mm tapered and straight baguettes ~3/4ct, 2.75ct TDW, 7.7 DWT;

(29) Ladies 18K white gold diamond ring containing center “yellow” cushion cut diamond 5mmx 4.6mm ~3/4ct, ROUND FULL CUT DIAMONDS: 20-1mm, 10-1.4mm, 2-2.1mm, 14-2.5mm, ~1.50ct, 62-1mm “yellow” diamonds ~1/2ct, 4.4 DWT;

(30) Ladies 14K white gold diamond ring containing center Oval Ruby 8mm x 9.7mm ~2.5ct, 16-2.4mm, 2-3mm, 18-2.6mm, 14-2.1mm ~ 3ct TDW, 5.8 DWT;

(31) Ladies 14K white gold diamond ring containing center “blue” diamond cushion cut ~.25pts, 6-2.8mm, 16-1.35mm, 16-2.3mm, 20-1.4mm ~1.3/4ct, 16-1.1mm “Pink” diamonds ~.14pts. 1 asscher cut and 1 bullet cut, ~.25p TW, 6.5 DWT;

(32) Ladies 14K white gold diamond pendant containing center Oval Ruby 10mm x 7.6mm ~2.5ct, 60-1.3mm, 24-2mm, 16-2.5mm ~ 2.75ct and 48-2.2mm x 2.5mm tapered baguettes ~2.25ct TW, 7.2 DWT;

(33) Ladies 14K white gold diamond pendant containing center Heart Shape Blue Synthetic Sapphire 7.6mm x 7.3mm ~1.5ct, 66-1.3mm ~,66pts, 49 2,4mm x

2mm baguettes ~2ct, 3.7 DWT;

(34) Ladies 18K white and yellow gold “LUCA” diamond pendant containing center natural Yellow (subject to GIA Grading) Cushion Cut diamond 5.4mm x 5.5mm ~ 1ct, 11 “rose cut” 3mm diamonds ~1.50ct and 66-1mm yellow diamonds ~.52pts., 3.02ct TDW, 4.3 DWT;

(35) Ladies 14K white gold diamond pendant containing 37 “pink” diamonds ranging in size from 2mm to 2.7mm ~ 2.20ct TW, 69-1.3mm RFC~ .69pts, 1-3mm RFC~.10pt, 4.4 DWT;

(36) Ladies 18K white and yellow gold diamond choker necklace containing 7 sections with 12 “black”, 84~1.25ct, 6 sections of 12 “yellow” ~1.10ct and 98 RFC~1.5ct, (~4ct TDW), 13.2 DWT;

(37) Ladies 18K white gold diamond pendant containing center 8.5mm x 7mm Oval Pink Sapphire, ~ 2ct ROUND FULL CUTS: 1-2.5mm, 8-2.0mm, 50-1.3mm, 14-2.6mm ~2ct, 34 baguettes, 1.6mm x 2.2mm ~ 1.25ct, 3.7 DWT with a 14K white gold chain 2.1 DWT;

(38) 14K white gold 16” Diamond By the Yard chain and diamond pendant containing center “pink” pear shape diamond~ .35pts and a 5mm ~.75pt “rose cut” diamond, with 4 rows of Round Full Cut diamonds: 50-1.3mm ~ .50pts, 51-1.5mm ~ .75pts, 14-1.9mm ~ 42pts. 8 round full cuts bezel set on the chain ~.55pts, TDW ~ 3.39ct, 6.9 DWT;

(39) Ladies 14K yellow gold “swirl” pendant/enhancer containing 33 “colored” diamonds: 16 pear shape, 8 oval shape, 6 cushion shapes, 2 marquise shape and 1 heart shape, 9 round full cut diamonds ~ 4ct TDW, 5.5 DWT;

(40) Ladies 14K white gold diamond pendant containing center “yellow” Pear Shape ~ 1.25ct, ROUND FULL CUTS: 14-1.80mm “yellow” ~.31pts, 19-1.85mm ~ .48cts, 72-1mm ~ .55pts, ~2.50ct TDW, 7.2 DWT;

(41) Ladies 18K 9mm white gold diamond and sapphire band containing 22-round 2.5mm Blue Sapphires ~ 1.50ct pts, 46-1mm ~.36pts round full cut diamonds, 5.3 DWT;

(42) Ladies 18K white gold diamond ring containing center Oval Pink Sapphire ~ 5.45mm x 7.5mm ~ 1.25ct, 53-1.4mm ~.56cts, 28- 1.7mm ~.56cts, ~1.15ct TDW, 7.5 DWT;

(43) Ladies 18K white and yellow gold diamond ring containing center Oval Blue Sapphire 7.14mm x 6mm ~1.25 ct, 64-1.5mm ~ 1ct, “yellow” diamonds, 68-

1mm round full cuts~1.52pts TDW, 5.5 DWT;

(44) Ladies 18K rose gold “Tiffany T” pave diamond square bracelet containing 60 round full cut diamonds=.74pts. “Genuine Tiffany”;

(45) Ladies 14K rose gold diamond bracelet with 23 sections each containing 4 round full cuts~.10pts, 88” 2.25ct TDW, (1 section missing), 10.6DWT;

(46) Ladies 14K white gold bracelet containing 12 emerald cut “Columbian Emerald” 6.76mm x4.70mm ~ .90pt ea, ~11ct TW, 177 round full cut diamonds~ .75pts, 20.5 DWT;

(47) Ladies 18K white gold diamond bracelet containing 147 1.3mm round full cut diamonds~1.50ct, 9.1 DWT;

(48) Ladies 14K white and yellow gold diamond bracelet containing 7 sections of “yellow” diamonds 3-5mm x 3mm oval shape ~.75, 2-6mm x 4mm pear shape ~1ct, 2-4.2mm x 4.2mm cushion shape~ 2. 75ct TW and ~ 350 -.08mm ~1. 75ct, round full cut diamonds prong set into halo's around each yellow diamond and 7 sections with a circle, 2 loops and 2 bars, 4.50ct TDW, 9.4 DWT;

(49) Ladies 18K white gold bracelet with 3 sections containing 5 shapes (pear, round, oval, heart and square) all made up of round full cut diamonds\* ~.25, ~3.75ct and 14 “Pink” diamonds~.70pts, 4.50ct TDW, 6.5 DWT;

(50) Ladies 14K white gold flexible cuff bracelet containing 2 ~ .25pt round brilliant cut diamonds with 14 round full cut diamonds ~.28pt around, ~ 1.00ct TDW, 3.0 DWT;

(51) Ladies 14K white gold diamond pave set pocketbook charm containing 62- 2.2mm rfc~2.25ct TDW, 14kt chain attached, 10.3 DWT;

(52) Ladies 14K white gold diamond pendant on black cord containing center emerald cut “Columbian Emerald” 6.64mm x 7.15mm ~ 1.5 ct. ROUND FULL CUT Diamonds: 20 -1.9mm ~.60pts, 4- 2.2mm ~ .18 pts,” .80pts TDW 4 TWD;

(53) Ladies 14K rose gold “Levian” crescent moon charm containing 52-1.8mm round full cut diamonds\* ~1.25ct TDW, 3.5 DWT;

(54) Ladies 14K white gold diamond “Martini Glass” necklace containing “Columbian Emerald” half-moon shape 5mm x 7.6mm x 3.3mm ~ 1ct, 1 “Yellow” diamond half-moon shape 4.7mm x6.6mm ~ 1ct, diamond half-moon shape 5mm x 8mm ~1.25ct, 6 straight baguettes ~.55pts, 3 tapered

baguettes ~.45pts, (green and pink synthetic stones). Chain contains 10 sections of 3 each bezel set diamonds 30 ~3ct, ~5ct TDW, 1.25ct Emerald, 5.9 DWT;

(55) Ladies 14K yellow gold necklace containing 4 pear shape “Columbian Emeralds” 5.8mm x 3.4mm, ~1.20TW, 2 round “Columbian Emeralds,” ~.30pts, 2 round full cuts, ~05pts, 6.6 DWT;

(56) Ladies 14K rose gold necklace containing Cushion Cut diamond 6.83mm x 7.07mm x5.09mm ~ 1.75ct, I color, VS2 clarity \*\*(subject to GIA grading), 32 round full cut diamonds ~.60pts in frame around center and in bail, bezel set diamonds by the yard chain 12-3.5mm round brilliant cut diamonds ~1.80pts set, 4.14ct TDW, 4 DWT;

(57) Ladies 14K white gold necklace with 7 clusters each containing 7 round brilliant cut~. 70pts, ~5ct TDW, 4.3 DWT;

(58) Ladies 18K tri color dia ring w/ center “yellow” cushion diamond - 5.4mm x 4.9mm ~.80pts, 4-2.2mm pink cushion diamonds ~.16pts, 48 - round 1mm “pink” dia ~.24pts, 18 -1mm yellow round dia ~.09pts, 4-1.5mm rfc ~.06pts, 1.35ct TDW 3.3 DWT;

(59) Ladies 18K white gold earrings each containing 16 oval rubies - 4mm x 3mm ~.25pts, ~4ct, 16 - 1.3mm rfc dia ~.16pts, 100 - 1mm rfc dia ~.50pts, 4 - .09mm ~.06pts, 2 - 1.1mm ~.0015pts, Each: .75pt, 4ct x2= 1.5ct TDW, 8 CT TGW, 4.6 DWT;

(60) Ladies 14K rose gold dangling earrings each containing 3 pave set discs with 6-1.7mm ~.24 and 26- 1.5mm ~.35, 9-1.3mm ~.09pts, ~1.50ct TDW, on euro wire, 3.6 DWT;

(61) Ladies 18K yellow gold ring containing center oval diamond ~¼ ct, there are 40 round full cut diamonds ~ 1ct graduating in sizes bead set into 5 sections around center oval, 1.25ct TDW, 2. 7 DWT;

(62) Ladies 18K white gold diamond ring containing “yellow” cushion cut diamond~ 5mm ~ 1ct, double halo around center, 1 row of 16-1.9mm ~ .42pts, 1 row of 12-2.45mm ~ .85pts, 5 rfc 1.9mm graduating on each side of the shank 10~.30pts, 2.50ct TDW, 3.9 DWT;

(63) Ladies 18K white gold earrings each containing 12 - 2.2mm round pink sapphires ~.48pts, 20 -1.8mm round pink sapphires ~ .50pts, 1 rfd - 2.2mm ~ .04pts, 2 - 1.8mm ~ .05pts, 6.2 DWT. Note: This ring contains a combination of diamonds, lab grown stones and high quality synthetic stones.;

(64) Ladies 18K white gold diamond and ruby ring containing center 5mm round brilliant cut diamond ~1/2ct, and 5 oval rubies ~ .30pts each ~ 1.50ct, 70 round full cuts ~1.2mm ~ .60pts, 1.10ct TDW, 1.50 Gem Stone Weight, 4.3 DWT;

(65) Ladies 14K white gold diamond ring containing center oval ruby, 6x5mm~1.00ct, diamond halo containing 15 round full cuts ~ .30pts, 12 round full cuts on each side 24 ~.30pts, 5 straight baguettes each side 10 ~.50pts, 4.9 DWT;

(66) 14K white gold cluster diamond earrings each containing 7 round brilliant cut, 14" 1.4cts TW, 2.5 DWT;

(67) 14K white gold stud earrings each containing 9 invisibly set, baguette & trapezoid diamond to appear as 1 large emerald cut ~1ct x 2 earrings ~ 2ct, 1.9 DWT;

(68) Ladies 18K white gold diamond ring containing 4 oval stones ~1ct tw, "yellow", "orange", "pink" & "gray" each surrounded by halo containing 13 round full cuts "colored" and natural -68 ~.70pts tw, 2.5 DWT;

(69) 14K white gold dangle earrings- each containing 9-1.3mm rfc on euro wire~ .09 pts, with 4 sections of 13-1.1mm ~ .40pts, 5-2mm ~.18 and center "pink" dia 4.2mm ~.25pt, x21.90ct TDW, 2.5 DWT;

(70) 14K white gold "huggy" earrings each containing 4- 3mm x 2mm straight baguettes 8 ~ 1ct, 44-.09mm halo set around each, 88 ~.70pts, 1.70 TDW, 2.7 DWT;

(71) 14K white gold earrings w/ 14K yellow gold posts and nuts, each containing center 5.4mmx 5mm ~ 55pt "yellow" heart shape diamonds, 2 = 1.10ct, 20 rfc- 1.7mm 40 ~ .80pts, bead set around center heart shape ~ 1.90 TDW, 2.6 DWT;

(72) 14K yellow gold 9" flat curb chain bracelet, 14.2 DWT;

(73) 14K white gold diamond and ruby bracelet containing 16 sections of 4 marquise rubies 3.2mm x 3.7mm ~.15pt =.60 and 1 round brilliant cut 3.7mm ~.20, 10ct TGW and 3.20ct TDW, 15.4 DWT;

(74) 14K white gold diamond "antique" style bracelet containing 9 sections each with oval ruby 4.1mm x 4.8mm ~.40pt ~3.60 TGW, 45-1.95mm~ 1.50ct, 108 -.1.25mm ~1.00ct, 2.50ct TDW, 20.1 DWT;

(75) 14K yellow and white gold bracelet containing 12 sections each with 1-3.6mm round brilliant cut 12~ 2ct TDW and 4 2mm round emeralds, 48~2ct TGW,

12.5 DWT;

(76) 18K yellow gold 4 row “colored” diamond bracelet containing 103 rd “yellow/brown” diamonds -2.2mm (.04pt) ~ 4.2cts, 86 assorted sizes and colors (avg 3.4mm) ~ 13cts, ~ 18cts TDW, 20.5 DWT;

(77) 14K white gold bracelet containing 17 sections each with center 6.85mm x5mm blue sapphire ~.80ptea ~13ct TGW and 15 1.7mm ~.02pts ea, 255~ 255 rfc ~ 5.lcts, 13.6 DWT;

(78) 18K white gold bracelet containing 8 sections each with center oval pink sapphire 7mm x5mm ~.90pt ea, ~ Sets TGW, 8 sections of infinity design each with 16- 1.3mm ~ 128 frc~1.25ct,2 RFC-2.2mm 16” .70pts, 16 RFC~ 1.8 mm, 128 ~ 3.20ct, ~5,25ct TDW, 11.1 DWT;

(79) 14K white gold “inside/outside” diamond hoop earrings each containing 12- 3.6mm ~ 2cts each earring, 4cts TDW, 4. 7 DWT;

(80) 14K rose gold 1 3/4” plus 1/2” bail circular “colored” diamond pendant on a black cord w 14k rose gold clasp containing 148 round full cuts-1.5mm ~ 2.25cts. There are 17 assorted sizes and shapes. Both natural and treated diamonds burnish set into the piece:5 round brown ~1ct, 1 oval blue/brown 6mm x 4mm ~1/2ct, 1 pear shape dark champagne 6mm x 4mm ~1/2ct, 4 pear shape light yellow ~.50pts, 2 square light yellow 2.5mm x 2.5mm ~.30pts, 2 oval 4mm x 3mm light yellow ~.40pts, 1 triangle yellow ~.20pts, 1 pear shape lit green/brown ~.25pts, 17 ~3.95ct, ~6.20ct TDW, 25.6 DWT;

(81) 18K white gold diamond dangle earrings each containing center oval blue sapphire 7mm x5mm ~ .75pr, 8 round blue sapphires 2.3mm ~ .55pts, 1- 2.7mm ~.10pts, top portion contains 15mm x 4mm ~.50pts, 1-1.7mm ~.03, 1.85ct 2 ~3.70ct TGW with top portion 21 rfc 1.1mm ~.11 and 148 rfc 1.3mm ~1.50ct, 1.67ct x 2+ 3.30ct TDW, 4.5 DWT;

(82) 18K white and rose gold diamond earrings each containing 46 rfc~ 1.3mm ~.45pts set into frames on top and bottom of dangle top containing 9 “pin” diamond 1.8mm ~.20pts, bottom 38”pink” diamonds ~2.25mm ~1.10ct and 1 rbc .10pt bezel set in between, 2.45ct x 2 =~ 5ct TDW, 5.5 DWT;

(83) 18K white gold dangle diamond earrings each containing 3 round brilliant cut “mult color” diamonds ~.75pts TW, 14 rfc 1.4mm ~.15pts, 37 rfc 1.5mm ~.55pts TW, ~ 3ct TDW top portion There are 19 “multi colored” diamonds of various shapes and sizes both natural and treated burnished into both earrings: 9 pear shapes yellow-brown ~1.25ct, 6 oval yellow-orange-brown~1ct, 1 radiant yellow ~.23pt, 1 round brilliant cut ~.10pt, 1 pear shape ~.20pts and 1

radiant~.20pts, 19 ~ 3ct TW (large multi) ~6ct TDW, 5.4 DWT;

(84) 18K white gold diamond earrings each containing center pink sapphire, 5.6mm ~.80pts, ROUND FULL CUTS: 12-1.7mm ~.24, 1-2.6mm ~.07pt, 1-2.2mm ~.04pt, 1-1.3mm ~.03pts, and 3 rows of graduating pave set diamonds 72-2.25mm ~3.00ct, 1.60ct TGW and 6. 75ct TDW, 7.5 DWT; and

(85) 14K white gold (plated yellow) diamond earrings each containing 22 RFC 2,3mm ~1.10ct There are 28 “multi colored” diamonds natural and treated ranging from light yellow/dark yellow to orange and brown burnish set into both earrings: 17 pear shapes ea ~.15pt ~2.55ct, 6 ovals ea ~.15pts ~.90pts, 2 marquise each ~.15pt ~.30pts and 3 cushion 3a “.15pt ~.45pts, 4.25ct total “multi diamond” and 2.20ct TW 6.50ct TDW, 6.4 DWT.

The United States reserves the right to supplement or amend this Bill of

Particulars.

Dated: Brooklyn, New York  
August 30, 2021

JACQUELYN KASULIS  
Acting United States Attorney  
Eastern District of New York  
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By: /s/  
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